

January 21, 2000

VIA AIRBORNE EXPRESS

Donna M. Caton
Chief Clerk
ILLINOIS COMMERCE COMMISSION
527 E. Capitol Avenue
Springfield, IL 62794-9280

Re: MCI WorldCom Response to Ameritech's Operational Support System ("OSS") Plan of Record Filed in Response to Condition Number 29 of the Commission's Order Granting the Ameritech/SBC Merger in Docket 98-0555

Dear Ms. Caton:

MCI WorldCom respectfully submits this response to the Operational Support System ("OSS") Plan of Record ("POR") that Ameritech filed with the Illinois Commerce Commission ("Commission") on January 7, 2000.

The Commission's order approving the merger of Ameritech and SBC required that Ameritech, among other things, complete a publicly available POR within three months of the merger closing date.¹ MCI WorldCom has reviewed Ameritech's POR and finds it non responsive to the Commission's Merger Order and wholly inadequate as a starting point for a collaborative in which parties are expected to obtain written agreement on OSS interfaces, enhancements, and business requirements identified in the POR. For these reasons, and as discussed in more detail below, MCI WorldCom respectfully requests that the Commission reject Ameritech's POR and direct Ameritech to expeditiously submit detailed specifications and business rules regarding OSS systems and improvements that it plans to implement in Illinois.

Contrary to the expectations embodied in the Commission's Merger Order, the POR provides absolutely no insight into substantive plans for the improvement, development and deployment and integration of OSS interfaces, business processes for Ameritech's OSS. Essentially the POR provides nothing more than a 10,000 foot view of OSS systems currently utilized by SBC and its various subsidiaries, including Ameritech. The document is really an executive summary -- a status report -- on systems in place, accompanied by announcements as to when further announcements will be made about substantive plans for the deployment of new systems, or modifications and improvements to existing systems.

¹SBC Communications, Inc., et al., Joint Application for Approval of the Reorganization of Illinois Bell Telephone Company, Illinois Docket 98-0555, Order, Sept. 23, 1999, ("Merger Order"), pp. 253-254.

The Section of the POR entitled “Ameritech Illinois FMO Timelines -- Release Schedule” at pages 36-37 of the POR highlights the lack of substance contained in the report. In bullet point format under each functional category of OSS, Ameritech has listed various OSS functions and dates corresponding to when it plans to make an announcement regarding its plans for those systems and when information regarding those plans will be released.

For example, according to the POR, the Commission, the third party tester and CLECs will not know exactly what Ameritech’s plans are with respect to how it plans to “update” its preordering application to application interface until sometime in May 2000. Business rules and specifications that provide the details essential to understanding what the systems are and what needs to be done to build to those systems will not be released until sometime in July 2000. With that schedule, it is contemplated that CLECs and the third party tester will not be able to begin testing until February 2001, and full implementation of the system (assuming it passes the tests) will not be completed until March 2001. Other OSS functions contain similar announcement, information release, and implementation timelines.

In short, the Commission and the CLECs still do not know and will not know for sometime what systems and modifications are planned much less what the proposed business rules and specifications are that will enable CLECs and the third party tester to build to those systems. Absent specific and detailed information regarding identifiable systems and specifics as to how upgrades will be made to existing systems, it is impossible to engage in any constructive discussion regarding proposed OSS interfaces, enhancements, and business requirements which the Commission contemplated would take place in the Phase 2 collaborative.

The Commission’s Merger Order specifically rejected the Ameritech/SBC OSS commitment for the same infirmities that exist in the POR:

We believe that Joint Applicants have been generally responsive in setting out a process for the planning, development, and deployment of fully operational and commercially available OSS in Illinois. However, we find that a more certain and expedited schedule and rigorous third-party testing and involvement are necessary to foster competition and to protect customers under the authority of §7-204(f) of the Illinois Public Utility Act.

We are persuaded by a number of intervenors that the schedule and approach volunteered by the Joint Applicants is too indefinite. As perhaps few other elements of telecommunications provisioning are more critical to the flow of benefits from competition to consumers we find that the process for OSS development and deployment should be well defined and involve Commission input when necessary. The Joint Applicants have offered conflicting evidence on their asserted commitment to build a viable OSS system. While “committing” to

having an operational OSS in 24 months the Joint Applicants phased plan would actually seem to require more than two years (5 months for Phase 1; 6 months for Phase 2; and 18 months for Phase 3) assuming no arbitration is necessary. The Commission is interested in establishing a definitive process which from beginning to end holds the Joint Applicants to their original two year time commitment.²

What the POR offers up is more of the same vague paper promises that Ameritech/SBC offered as commitments during the merger proceeding, leaving ample “wiggle” room for defining what they have, or have not, committed to in regard to developing and deploying commercially viable OSS in Illinois. The Merger Order called on Ameritech to bring forth “well defined” plans for development and deployment of OSS in the accelerated timeframe set by the Commission.³ The POR is not responsive to the directives of the Merger Order. It does not contain substantive identification of systems, enhancements, specifications and business rules. Consequently, there is nothing of substance for Commission Staff, the third party tester, CLECs and Ameritech to discuss in the OSS collaborative which the Commission's Merger Order intended commence soon after the filing and “approval” of the POR. The sooner Ameritech provides the specifics, the sooner that process can begin.

In addition, the POR lacks any discussion regarding OSS functions and the extent to which they are dependent on back-office system capabilities, despite a recognition by Ameritech and SBC that such systems would be identified and included in their OSS evaluation and system upgrade plans.⁴ As a result, there is no way for the Commission or CLECs to discern from the POR the interaction between specific back-office systems and OSS functionalities and the extent to which back-office system capabilities will impact proposed OSS improvements once the improvements are announced.

Finally, MCI WorldCom notes that Ameritech appears to have punted its obligations with respect to development and deployment of OSS for Digital Subscriber Loop (“DSL”) qualification to the Federal Communications Commission (“FCC”). Instead of addressing the Commission’s directives with respect to the deployment of OSS functionalities for advanced services,⁵ Ameritech’s Illinois POR simply says that DSL qualification functionality will be accomplished as

²Merger Order, p. 195 (emphasis added).

³Merger Order, pp. 195-197.

⁴Merger Order, p. 188.

⁵Merger Order, p. 197.

described in the xDSL POR that Ameritech filed with the FCC on December, 7, 1999.⁶ Much like Ameritech's Illinois POR its xDSL POR is deficient because it is overly vague and lacks any clear commitments.⁷ Regardless of what Ameritech said in its xDSL POR, it is obvious that the Illinois Commission has given specific direction with respect to OSS for advance services. Instead of addressing that directive on OSS for advanced services, Ameritech's POR cavalierly declines to provide any specifics whatsoever about its intention to comply with this Commission's requirement that Ameritech:

. . .shall ensure that OSS systems, once modified in the three-phase process to interface with CLECs, provide the following information in an online format available 24 hours a day: (a) physical medium of loops; (b) loop length in equivalent 26 gauge; (c) length and location of bridged taps and (d) the presence of load coils, repeaters, DLC systems, DAMLS or any other interferers or equipment which parties to the collaborative process deem necessary to provision loops for xDSL service in a non-discriminatory fashion.⁸

For all of these reasons, Ameritech's POR is non responsive to the directives in the Commission's Merger Order. The POR provides absolutely no insight into substantive plans for the improvement, development and deployment and integration of OSS interfaces and business processes for Ameritech's OSS and fails to provide a basis upon which discussions between Commission Staff, the third party tester, CLECs and Ameritech can move forward. Accordingly, MCI WorldCom respectfully requests that the Commission reject Ameritech's POR and direct Ameritech to expeditiously submit detailed specifications and business rules regarding OSS systems and improvements that it plans to implement in Illinois so that Phase 2 of Merger Order condition number 29 can move forward in earnest.

Donna Caton

⁶Ameritech Illinois POR, p. 26.

⁷MCI WorldCom expressed its concerns about the xDSL POR directly to Ameritech. For the convenience of the Commission, MCI WorldCom has attached its response to Ameritech's xDSL POR to this correspondence.

⁸Merger Order, p. 197.

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If you have any questions regarding this correspondence, please call me.

Very truly yours,

Darrell S. Townsley

Enclosures

cc: Chairman Mathias
Commissioner Harvill
Commissioner Hurley
Commissioner Kolhauser
Commissioner Kretschmer
Patrick E. McLarney
Frank Bodine
Sam McClerren
G. Darryl Reed
Thomas G. Aridas